

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

-----X

IN RE TERRORIST ATTACKS ON

CIVIL ACTION NO.

SEPTEMBER 11, 2001

03 MDL 1570 (GBD)

-----X

FIONA HAVLISH, in her own right :
and as Executrix of the ESTATE OF :
DONALD G. HAVLISH, JR., Deceased, :
et al., :

CIVIL ACTION NO.
03-CV-9848 – GBD

v. :

THE ISLAMIC REPUBLIC OF IRAN :
et al. :

PLAINTIFFS' DAMAGES INQUEST MEMORANDUM

Exhibit M

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FOR THE SOUTHERN DISTRICT OF NEW YORK**

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SEPTEMBER 11, 2001

03 MDL 1570 (GBD)

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FIONA HAVLISH, in her own right
and as Executrix of the ESTATE OF
DONALD G. HAVLISH, JR., Deceased,

:
:
:

CIVIL ACTION NO.

RUSSA STEINER, in her own right
and as Executrix of the ESTATE OF
WILLIAM R. STEINER, Deceased,

:
:
:

03-CV-9848 – GBD

CLARA CHIRCHIRILLO, in her own right
and as Executrix of the ESTATE OF
PETER CHIRCHIRILLO, Deceased,

:
:
:

Case Transferred from the
United States District Court
for the District of Columbia
Case Number 1:02CV00305

TARA BANE, in her own right,

and as Executrix of the ESTATE OF
MICHAEL A. BANE, Deceased,

:
:
:
:

**AFFIDAVIT OF
THOMAS E. MELLON, JR.
REGARDING ATTORNEY
EXPENSES**

GRACE M. PARKINSON-GODSHALK, in her
own right and as Executrix of the ESTATE OF
WILLIAM R. GODSHALK, Deceased,

:
:
:

ELLEN L. SARACINI, in her own right
and as Executrix of the ESTATE OF
VICTOR J. SARACINI, Deceased,

:
:
:

THERESANN LOSTRANGIO, in her own right
and as Executrix of the ESTATE OF
JOSEPH LOSTRANGIO, Deceased, *et al.*,

:
:
:

Plaintiffs,

v.

:
:

SHEIKH USAMAH BIN-MUHAMMAD
BIN-LADEN, a.k.a. OSAMA BIN-LADEN,

:
:

AL-QAEDA/ISLAMIC ARMY,

:
:

an unincorporated association, *et al.*, :

FOREIGN STATE DEFENDANTS: :

THE ISLAMIC REPUBLIC OF IRAN, :

AYATOLLAH ALI-HOSEINI KHAMENEI, :

ALI AKBAR HASHEMI RAFSANJANI, :

IRANIAN MINISTRY OF
INFORMATION AND SECURITY, :

THE ISLAMIC REVOLUTIONARY
GUARD CORPS, :

HEZBOLLAH,
an unincorporated association, :

THE IRANIAN MINISTRY
OF PETROLEUM, :

THE NATIONAL IRANIAN
TANKER CORPORATION, :

THE NATIONAL IRANIAN
OIL CORPORATION, :

THE NATIONAL IRANIAN
GAS COMPANY, :

IRAN AIRLINES, :

THE NATIONAL IRANIAN
PETROCHEMICAL COMPANY, :

IRANIAN MINISTRY OF
ECONOMIC AFFAIRS AND FINANCE, :

IRANIAN MINISTRY OF
COMMERCE, :

IRANIAN MINISTRY OF DEFENSE
AND ARMED FORCES LOGISTICS, :

THE CENTRAL BANK OF THE :
ISLAMIC REPUBLIC OF IRAN, *et al.*, :
 :
 :
Defendants. :

AFFIDAVIT
REGARDING ATTORNEY EXPENSES

I, **Thomas E. Mellon, Jr.**, of Mellon Webster & Shelly of Doylestown, Pennsylvania, am the Co-Lead Counsel in the above-captioned case along with **Dennis G. Pantazis** of Wiggins, Childs, Quinn & Pantazis of Birmingham, Alabama.

Since February 2002, the *Havlish* consortium of plaintiff attorneys have carefully documented all expenditures by the below named thirteen law firms which have contributed to the overall expenses pertaining to every aspect of the *Havlish* case, including but not limited to, investigators; court fees; over 100 client interviews; approximately 35 expert interviews; domestic travel throughout the United States; international travel involving approximately 20 trips to Canada, Greece, Germany, France, and Great Britain for witness interviews and meetings with foreign governmental officials; hotel expenses; expert witness fees; thousands of telephone and conference calls; contract attorneys; meetings and general office costs.

Havlish Plaintiff attorneys **Richard Hailey** and **Mary Beth Ramey** of Ramey & Hailey of Indianapolis, Indiana and **Don Winder** of Winder & Counsel of Salt Lake City, Utah, have supervised the accounting of the *Havlish* case.

Accordingly, I hereby certify, affirm and swear that the following the expenses were incurred in the investigation and prosecution of the *Havlish* case to date:

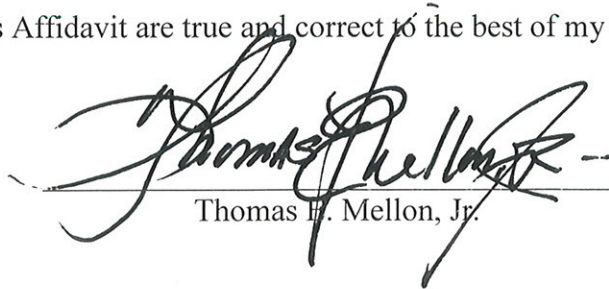
Burbidge & Mitchell The Parkside Tower 215 S. State Street, #920 Salt Lake City, UT 84111	\$50,000.00
Foote, Meyers, Mielke & Flowers, LLC 3 North Second Street Suite 300 St. Charles, IL 60174	\$139,663.80
Howarth & Smith 523 West Sixth Street Suite 728 Los Angeles, CA 90017	\$41,519.00
Lamm Rubenstone, LLC 3600 Horizon Blvd., Suite 200 Trevose, PA 19053	\$108,787.00
David C. Lee, Esquire 37 N. Orange Ave., Suite 500 Orlando, FL 32801	\$105,000.00
Law Office of J.D. Lee 422 South Gay Street, 3 rd Floor Knoxville, TN 37902	\$213,620.81
Mellon Webster & Shelly 87 N. Broad Street Doylestown, PA 18901	\$646,521.22
Ness, Motley, P.A. 28 Bridgeside Blvd Mt. Pleasant, SC 29464	\$25,000.00
Ramey & Hailey 9333 North Meridian Street, Suite 105 Indianapolis, IN 46260	\$77,200.00
Stein, Mitchell & Mezines 1100 Connecticut Avenue NW Washington, DC 20036	\$27,500.00
Terrell Hogan Ellis Yegelwel, P.A. 233 East Bay Street Blackstone Building, 8 th Floor Jacksonville, FL 32202	\$182,485.34

Wiggins, Childs, Quinn & Pantazis, LLC \$292,511.68
The Kress Building
301 19th Street North
Birmingham, AL 35203

Winder & Counsel \$68,037.64
175 West 200 South, Suite 4000
P.O. Box 2668
Salt Lake City, UT 84110-2668

TOTAL EXPENSES: **\$1,977,846.49**

I, **THOMAS E. MELLON, JR.**, being duly sworn, do hereby swear and affirm under penalty of perjury that the contents of this Affidavit are true and correct to the best of my knowledge, information, and belief.


Thomas E. Mellon, Jr.

Sworn to before me this the 14th day of February, 2012, in Pennsylvania.



Notary Public

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Susan T. Case, Notary Public
Doylestown Boro, Bucks County
My Commission Expires April 7, 2013
Member, Pennsylvania Association of Notaries